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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )

)  
Amendment of the Rules Relating to )  
Permissible Uses of the Vertical )  
Blanking Interval of Broadcast )  
Television Signals )

MM Docket No. 92-305

Comments of  
The WGBH Educational Foundation  
Boston, Massachusetts

26 February 1993

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The WGBH Educational Foundation ("WGBH") hereby responds to the Commission's proposal to amend its Rules governing use of the vertical blanking interval ("VBI") of television broadcast signals. Specifically, the Commission has proposed to allow use of line 21, field two, of the VBI for transmission of closed captioning and other data services and to reserve line 19 of the VBI for optional use of a ghost-cancelling reference signal. WGBH supports both of these proposals, particularly that dealing with use of line 21.

WGBH pioneered television captioning twenty years ago and continues to be a major supplier of this important service. WGBH has also participated as a member of the Television Data Systems Subcommittee ("TDSS") of the Electronic Industries Association/Consumer Electronics Group, originator of the Petition for Rulemaking in the above-noted matter ("the Petition").

WGBH fully supports the proposed Rulemaking. The need for additional bandwidth for the closed-captioning service is widely recognized by users and providers of the service and has been noted by the Commission in its Report and Order adopted 12 April 1991 (at ¶ 36).

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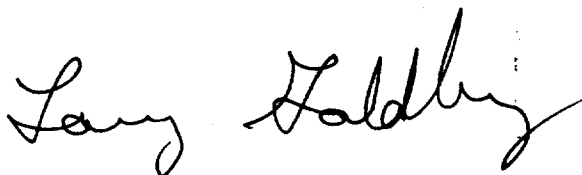
The TDSS, besides filing the Petition, has drafted comprehensive Recommended Practices ("EIA-608") which reflect the broad consensus of receiver manufacturers, caption service providers and the broadcast industry. These Recommended Practices answer the need for additional captioning bandwidth while providing an incentive for the early implementation of field-two capability in receivers. The Extended Data Services ("EDS") plan developed by TDSS and documented in EIA-608 leverages caption decoder technology for a wide range of valuable new services to television users and broadcasters. The attractiveness of EDS neatly solves the "chicken-and-egg" problem which would have otherwise stymied the implementation of new captioning services on field two: until field-two services are on the air, there is no market for field-two-capable receivers, and with no receivers in use by consumers, there can be no funding for new services. We congratulate the TDSS for devising a plan which hastens the availability of the full range of new services on line 21, field two, and the early implementation of this capability by receiver manufacturers.

The Commission asks whether the use of line 21, field two, might interfere with the visible portion of the television signal, or if there might be some adverse interaction between such signals and existing data services using line 22. At least one answer has already been provided, albeit accidentally, by broadcasters who inadvertently exchange the two video fields during playback of closed-captioned videotapes. This is an all-too-frequent problem which is gradually disappearing as broadcasters become more aware of the importance and technical requirements of the captioning service. When such field-flipping occurs, the presence of caption data on line 21, field two, has been seen to cause no interference with the visible picture. Furthermore, even when line-22 data are present, the caption data on line 21, field two, continue to be recoverable on receivers so equipped.

The Commission also asks whether the definitions of "captions," "text," and "extended data service information" need to be further clarified. WGBH believes that the Rules as they stand, supplemented by EIA-608, provide abundantly clear definitions of these and all related terms. We do not see any need for further clarification.

Accordingly, WGBH supports the Commission's proposal to move expeditiously in altering its Rules to permit all of line 21 to be used for closed captioning and other data services.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Larry Goldberg".

Larry Goldberg, Director  
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